

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TONY KHOURY, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FXCM INC., DROR NIV and ROBERT
LANDE,

Defendants.

No.: 1:17-cv-00916

**NOTICE OF MOTION AND
MOTION OF THE GLOBAL
BROKERAGE INVESTOR
GROUP FOR CONSOLIDATION,
APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF
COUNSEL**

YING ZHAO, Individually and on Behalf of All
Others Similarly Situated,

Plaintiff(s),

v.

FXCM INC., DROR NIV and ROBERT N.
LANDE,

Defendants.

No.: 1:17-cv-00955

DAVID BLINN, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff(s),

v.

FXCM INC., DROR NIV and ROBERT N.
LANDE,

Defendants.

No.: 1:17-cv-01028

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that Wendy Howell, Gene Segalis, John Dearborn, and Timothy Black (collectively, the “Global Brokerage Investor Group”), by and through their counsel, will and do hereby move this Court, pursuant to Section 21D(a)(3) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3), as amended by the Private Securities Litigation Reform Act of 1995, for the entry of an Order: (1) consolidating the above-captioned related actions; (2) appointing the Global Brokerage Investor Group as Lead Plaintiff on behalf of all persons and entities that purchased or otherwise acquired the securities of Global Brokerage, Inc. f/k/a FXCM Inc. between March 15, 2012 and February 6, 2017; (3) approving Lead Plaintiff’s selection of Pomerantz LLP as Lead Counsel for the Class; and (4) granting such other and further relief as the Court may deem just and proper.

Dated: April 10, 2017

Respectfully submitted,

POMERANTZ LLP

/s/ Jeremy A. Lieberman

Jeremy A. Lieberman
J. Alexander Hood II
Hui M. Chang
600 Third Avenue, 20th Floor
New York, NY 10016
Telephone: (212) 661-1100
Facsimile: (212) 661-8665
Email: jalieberman@pomlaw.com
ahood@pomlaw.com
hchang@pomlaw.com

POMERANTZ LLP

Patrick V. Dahlstrom
Ten South LaSalle Street, Suite 3505
Chicago, Illinois 60603
Telephone: (312) 377-1181
Facsimile: (312) 377-1184
Email: pdahlstrom@pomlaw.com

*Counsel for Movants and
Proposed Lead Counsel for the Class*

**BRONSTEIN, GEWIRTZ
& GROSSMAN, LLC**

Peretz Bronstein
60 East 42nd Street, Suite 4600
New York, NY 10165
Telephone: (212) 697-6484
Facsimile (212) 697-7296
Email: peretz@bgandg.com

Additional Counsel for Movants

GOLDBERG LAW PC

Michael Goldberg
Brian Schall
Sherin Mahdavian
1999 Avenue of the Stars, Suite 1100
Los Angeles, California 90067
Telephone: 1-800-977-7401
Fax: 1-800-536-0065
Email: michael@goldberglawpc.com
Email: brian@goldberglawpc.com
Email: sherin@goldberglawpc.com

Additional Counsel for Movants